

REMARKS

Applicants certainly appreciate the allowance of claims 9-12. Applicants also appreciate the indication of allowance of claims 2, 4-8 and 14-16, if amended to become independent, incorporating the requirements of the base claims and any intervening claims. Rather than amend these claims to become independent, Applicants have amended the base claims and submit that the base claims are allowable as amended. Applicants respectfully traverse the rejection of claims 1, 3 and 13 over Huntsinger and respectfully reconsideration.

A key feature of the invention is that pump assembly 53 is contained within a capsule 45 while it is lowered into and retrieved from housing 29. This containment is particularly important while being retrieved because capsule 45 prevents well fluid contained on and in pump assembly 53 from polluting the sea. This invention allows pump assembly 53 to be retrieved from the sea floor without the need for a riser to contain well fluids within it.

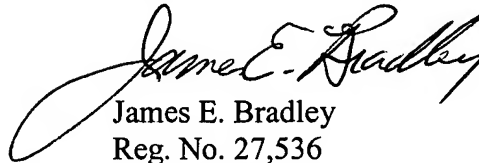
In Huntsinger, in the embodiment of Figure 5, a string of tubing 200 is installed in the well. Tubing 200 has a tubing hanger 202 at its upper end that lands in the wellhead assembly. Then, submersible pump assembly 10 is lowered on wireline 71 with a running tool 70 that engages fishing neck 68 of landing head 53. Pump assembly 10 is suspended below landing head 53 by power cable 52 (Fig. 5b) Landing head 53 lands on the upper end of tubing hanger 202 (col. 7, lines 22-24) and pump assembly 10 lands on a tubing seat (col. 7, lines 25-28), which is numbered 15 in Figure 1b and located at the lower end of tubing 200. For retrieval of the pump assembly, wireline 71 engages landing head 53 and retrieves assembly 10 while tubing 200 remains in the well. The pump assembly is lowered and retrieved through a riser 50 (Figure 1a).

Claim 1 as amended requires that the capsule be retrievable from the primary housing while containing the pump assembly therein. Applicants submit that the word "capsule" does not describe production tubing 200 of Huntsinger. Even assuming that the word "capsule" could be used to describe tubing 200 of Huntsinger, the reference still would not meet the requirements of claim 1. Tubing 200 is not retrievable while containing the pump assembly therein. Rather, the pump assembly must first be retrieved. Landing head 53 lands on top of tubing hanger 202, preventing any running tool from engaging tubing hanger 202 until the pump assembly is retrieved. Furthermore, it is well known that production tubing such as tubing 200, is typically made up of sections of pipe, about 30 ft. in length that are secured together by threads and extend into the well typically for thousands of feet. One would not be able to unscrew the sections of pipe if the pump assembly and cable were still contained therein. Applicants submit that claim 1 and its dependent claim 3 should be allowed.

Claim 13 requires lowering the capsule from the surface into the primary housing while the pump assembly is contained therein. In Huntsinger, tubing 200 is first installed and perforated, then ESP 10 is lowered into tubing 200 of wireline 71. Applicants submit that claim 13 also be allowed.

It is respectfully submitted that the claims are now in condition for allowance and favorable action is respectfully requested.

Respectfully submitted,



James E. Bradley
Reg. No. 27,536
Attorney for Applicants

Date: Dec 2 2005
BRACEWELL & GIULIANI LLP
P. O. Box 61389
Houston, Texas 77208 1389
Tel: (713) 221-3301
Fax: (713) 222-3287